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October 11, 2011

The Honorable Frederic Block
United States Courthouse
225 Cadman Plaza East
Brooklyn, N.Y. 11201

Re: *Bedeau, et al. v. City of New York, et al.*, 11 CV 2697 (FB) (JO)

Your Honor:

I represent the three plaintiffs in this civil rights action alleging police misconduct. I write to request a pre-motion conference to discuss plaintiffs' anticipated motion for a default judgment against the six defendant police officers who were named for the first time in the amended complaint, Shawn Charlson, Steven Hom, Victoria Lafauci, Wilson Sagardia, Mark Scarlatelli and Oleg Uruymagov. These officers were served with the amended summons and the amended complaint on September 8, 2011 and their answers were due on September 29, 2011. *See* docket entries 9-14.

I left a voicemail message for defense counsel last week about the fact that all defendants were in default, including the City and the one police officer named in the original complaint, Timur Evren. Today, an answer was finally filed on behalf of the City and Evren.

I also told defense counsel last week that I would consent to a 2 week extension for the new police officer defendants to answer, assuming of course that defense counsel made a valid request for an extension to the Court.

However, no request for an extension was made on behalf of those officers; instead, defense counsel wrote in a footnote to the City's and Evren's answer filed today that the City is still deciding representational issues as to the new officers.

Thus, since Shawn Charlson, Steven Hom, Victoria Lafauci, Wilson Sagardia, Mark Scarlatelli and Oleg Uruymagov are in default and no request for an extension has been or is being made on their behalf, I request permission to move for a default judgment as against these officers.

Respectfully,

/s/

Richard Cardinale

Copy: Elan Parra